## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA, and

MATTHEW LOPES REVENUE

OFFICER, INTERNAL REVENUE : CIVIL ACTION No. 11-6591 SERVICE : CIVIL ACTION No. 11-6592

:

V.

:

MICHAEL J. AMABILE

:

## **ORDER**

AND NOW, this 20th day of December, 2011, it is ORDERED that, as set forth in the accompanying Memorandum, defendant Michael J. Amabile shall, on or before Monday, January 9, 2012, compile all documents responsive to the IRS summons, create a log describing each document that he believes to be protected by the Fifth Amendment and to produce to IRS officer Matthew Lopes all documents that Mr. Amabile views as non privileged.

It is FURTHER ORDERED that Mr. Amabile shall supply the Court with the privilege log for in camera review along with the documents identified as privileged in the log so that the Court may make a determination as to whether he must provide to the Government any or all of the documents in question.

It is FURTHER ORDERED that defendant's motion to dismiss the government's petition to enforce the IRS summonses and to vacate the show cause orders and his motion requesting judicial notice of facts are DENIED.

s/Thomas N. O'Neill, Jr.
THOMAS N. O'NEILL, JR., J.